



September 05, 2008

Ms. Marlene S. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Ex Parte Statement**  
**ET Docket No. 08-59**

Dear Ms. Dortch:

Bell Helicopter ("Bell") hereby submits comments concerning the issues presented in the above-referenced proceeding.

As you know, Bell is a world leader in vertical takeoff and landing aircraft for commercial and military applications. Bell's business has grown recently both in the military and commercial arenas due to number of factors. Most importantly, the helicopter industry is entering a significant replacement cycle since 40 percent of today's fleet is more than 25 years old. In addition, Bell has seen an increase in use of helicopters for emergency medical services, law enforcement, disaster relief, global war on terror, and remote oil and gas exploration and production. To meet the needs of such a diverse military and commercial customer base, Bell needs to stay focused on developing, testing, and delivering helicopters with the newest technology available.

Bell understands that the Commission is considering a proposal by GE Healthcare ("GEH") for a new spectrum allocation for a Medical Body Area Network Service ("MBANS") in the band 2360-2400 MHz. However, this part of the spectrum has been allocated exclusively for purposes of gathering telemetry during flight testing of aircraft and missiles. As one who has been conducting flight tests for many, many years, Bell believes that any possibility of interference due to a shared spectrum allocation in the 2360-2400 MHz would be severely damaging to our business and our industry.

We presently have ongoing test programs for the following aircraft at several locations around the county.

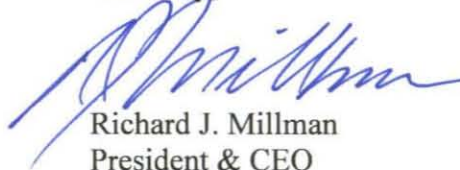
V-22 Osprey for the Marine Corp and Air Force  
AH-1Z Cobra's and UH-1Y Huey's for the Marine Corp

ARH-70A for the Army  
BA 609 civilian tiltrotor  
429 Light Twin

In addition, Bell believes that there would be no reasonable way to control the use of MBANS. There would be a constant threat to the health of the patient and to the safety and validity of flight testing. While MBANS technology might prove promising in the future, Bell believes that such technology would be best utilized in a different band of the spectrum.

Therefore, Bell strongly urges the Commission to dismiss GEH's proposal to operate MBANS in the band 2360-2400 MHz.

Sincerely,



Richard J. Millman  
President & CEO  
Bell Helicopter

cc: The Honorable Kevin J. Martin  
Chairman  
The Honorable Michael J. Copps  
The Honorable Jonathan S. Adelstein  
The Honorable Deborah Taylor Tate  
The Honorable Robert M. McDowell